

# **EXHIBIT A**

**SUGGESTION**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
BECKLEY DIVISION**

**THOMAS K. LAMPERT, as Trustee  
for the THOMAS K. LAMPERT  
IRREVOCABLE TRUST,**

**Plaintiff,**

**Civil Action No. 5:15-cv-6746**

**v.**

**TAMS MANAGEMENT, INC.,  
SOUTHERN COAL CORPORATION,**

**Defendants.**

WHEREAS, in a civil action in which judgment was recovered in the United States District Court for the Southern District of West Virginia on the 18<sup>th</sup> day of March, 2016 and AMENDED on the 12<sup>th</sup> day of July, 2016, by **Thomas K. Lampert**, as Trustee for the Thomas K. Lampert Irrevocable Trust against **Tams Management, Inc.** and **Southern Coal Corporation** for \$2,454,970.99, with legal interest thereon at the rate of \$45.74 per day, from the 18<sup>th</sup> day of March, 2016, until paid, and upon which judgment a writ of FIERI FACIAS has issued, and is now in the hands of the United States Marshall for the Southern District of West Virginia, unpaid and unsatisfied, the Plaintiff **Thomas K. Lampert**, as Trustee for the Thomas K. Lampert Irrevocable Trust, by attorney, suggests that there is a liability, by reason of the lien of said writ upon **Wells Fargo Securities, LLC**, of said district, who is not the judgment debtor. The Clerk is therefore required to issue a summons upon said Suggestion.

*/s/ Isaac R. Forman*

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Brian A. Glasser (WV Bar #6597)  
Isaac R. Forman (WV Bar #11668)  
Bailey & Glasser LLP  
209 Capitol Street  
Charleston, WV 25301  
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iforman@baileyglasser.com

TO THE UNITED STATES MARSHALL FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA:

In the name of the United States of America, we command you to summon **Wells Fargo Securities, LLC**, if it be found in your bailiwick, to serve upon **Isaac R. Forman**, Plaintiff's attorney, whose address is **Bailey & Glasser, LLP, 209 Capitol Street, Charleston, WV 25301**, an answer, in writing under oath, to the above suggestion within 20 days after service of this summons.

DATED: \_\_\_\_\_

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Clerk, U.S. District Court